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**UNITED STATES DISTRICT COURT**

**DISTRICT OF OREGON**

**PORTLAND DIVISION**

**UNITED STATES OF AMERICA,**

**Case No. 3:12-cv-02265-SI**

**Plaintiff,**

**JOINT STATUS RERPOT and REQUEST  
FOR STAY OF CURRENT CASE  
DEADLINES**

**v.**

**CITY OF PORTLAND,**

**Defendant.**

The United States, through undersigned counsel, submits the following joint status report and request for a Stay on behalf of all Parties.

The United States and the City of Portland (City) are on a common path forward to resolve Defendant-Intervenor's, Portland Police Association (PPA), objections to the proposed Settlement Agreement. As the Court is aware, Amicus Albina Ministerial Alliance (AMA)

previously withdrew their objections to the proposed Settlement Agreement upon the approval of a separate Collaborative Agreement as agreed by the AMA, the City, and the United States. The United States and City of Portland have now reached a tentative memorandum of agreement (MOA) with the PPA to resolve their objections to the proposed Settlement. The United States, the City and PPA expect the MOA to be signed upon ratification and approval of the tentative Collective Bargaining Agreement. This approval process, which involves only the City and PPA, is expected to take place in the coming weeks.

So long as the CBA and MOA are approved by the City and the PPA, the PPA agrees to withdraw their objections to the proposed Settlement Agreement on or before the Court's next scheduled hearing set for December 17, 2013.

Based on the status as provided above, the Parties jointly request the Court to stay current case deadlines, and to use the previously scheduled hearing with the Parties on December 17<sup>th</sup> to discuss scheduling of an anticipated fairness hearing.

Respectfully submitted this 8<sup>th</sup> day of November, 2013.

Attorneys for Plaintiff, United States:

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J. ASHLEE ALBIES